

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ASHLEY COX, <i>et al.</i> ,)	
)	
PLAINTIFFS,)	
)	
v.)	Case No: 3:21cv253-HEH
)	
ELLEN MARIE HESS,)	
in her official capacity as Commissioner)	
of the Virginia Employment Commission,)	
)	
DEFENDANT.)	
_____)	

PLAINTIFFS' PETITION FOR AWARD OF ATTORNEYS' FEES

Pursuant to Fed. R. Civ. P. 54(d) and this Court's January 6, 2022, Order (ECF 56 ¶ 6), plaintiffs Ashley Montgomery Cox, Emily Dimond, Penny Williams, Melissa Dimmerling, and Lenita Gibson, on behalf of themselves and all others similarly situated ("Plaintiffs"), respectfully petition this Court for entry of an Order awarding \$378,867 in attorneys' fees.

As set forth in the accompanying memorandum of law and declarations, Plaintiffs are "prevailing part[ies]" in this litigation for the purposes of 42 U.S.C. § 1988(b), and they have properly documented the hours reasonably incurred by their attorneys and the hourly rates that reasonably apply to those hours.

A proposed order is attached.

[signatures on following page]

Respectfully submitted,

Ashley Montgomery Cox, Emily Dimond, Penny Williams, Melissa Dimmerling and Lenita Gibson,
on behalf of themselves and all others
similarly situated.

By: _____/s/_____

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day February, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record registered with the CM/ECF system, including the following:

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